

CHEYENNE JONES AND SARA J.	)	
GAST, Individually and as representatives	)	
of a class of similarly situated persons, on	)	
behalf of the COCA-COLA	)	
CONSOLIDATED, INC. 401(K) PLAN,	)	
	)	
Plaintiffs,	)	Case No. 3:20-cv-00654-FDW-DSC
v.	)	
	)	
COCA-COLA CONSOLIDATED, INC.,	)	
THE BOARD OF DIRECTORS OF COCA-	)	<b>JOINT NOTICE OF SETTLEMENT &amp;</b>
COLA CONSOLIDATED, INC., THE	)	<b>JOINT MOTION TO STAY</b>
CORPORATE BENEFITS COMMITTEE	)	<b>DEADLINES</b>
OF COCA-COLA CONSOLIDATED,	)	
INC.; and DOES No. 1-20, Whose Names	)	
Are Currently Unknown,	)	
	)	
Defendants.	)	
	)	

With the assistance of a mediator, the Parties have reached an agreement in principle to settle all matters in controversy between them. The Parties are in the process of finalizing and documenting the terms of that settlement and respectfully request the Court stay all case deadlines until Monday, March 7, 2022. The Parties request this stay to finalize the written settlement agreement and for Plaintiffs to submit the necessary Motion for Preliminary Approval.

1

Respectfully submitted January 19, 2022.

/s/ James E. Miller (with permission)

Daniel K. Bryson, NC Bar No. 15781  
Jeremy R. Williams, NC Bar No. 48162  
Whitfield Bryson LLP  
900 W. Morgan Street  
Raleigh, NC 27603  
Telephone: (919) 600-5000  
Facsimile: (919) 600-5035  
Email: dan@whitfieldbryson.com  
jeremy@whitfieldbryson.com

Kolin C. Tang  
Miller Shah LLP  
201 Filbert Street, Suite 201  
San Francisco, CA 94133  
Telephone: (415) 429-5272  
Facsimile: (866) 300-7367  
Email: kctang@millershah.com

James E. Miller  
Laurie Rubinow  
Miller Shah LLP  
65 Main Street  
Chester, CT 06412  
Telephone: (860) 526-1100  
Facsimile: (866) 300-7367  
Email: jemiller@millershah.com  
lrubinow@millershah.com

James C. Shah  
Michael P. Ols  
Alec J. Berin  
Miller Shah LLP  
1845 Walnut Street, Suite 806  
Philadelphia, PA 19103  
Telephone: (610) 891-9880  
Facsimile: (866) 300-7367  
Email: jcshah@millershah.com  
mpols@millershah.com  
ajberin@millershah.com

Mark K. Gyandoh (*pro hac vice*)  
Gabrielle P. Kelerchian  
Capozzi Adler, P.C.

/s/ Brian D. Boone

Brian D. Boone  
North Carolina Bar No. 38910  
Brandon C.E. Springer  
North Carolina Bar No. 54523  
ALSTON & BIRD LLP  
101 South Tryon Street, Suite 4000  
Charlotte, North Carolina 28280  
Phone: 704-444-1000  
Fax: 704-444-1111  
brian.boone@alston.com  
brandon.springer@alston.com

Emily S. Costin  
(*pro hac vice*)  
ALSTON & BIRD LLP  
The Atlantic Building  
950 F Street, NW  
Washington, DC 20004  
Phone 202-239-3695  
Fax: 202-239-3333  
emily.costin@alston.com

Jordan Edwards  
(*pro hac vice*)  
R. Blake Crohan  
(*pro hac vice*)  
ALSTON & BIRD LLP  
One Atlantic Center  
1201 West Peachtree Street, Suite 4900  
Atlanta, GA 30309  
Phone: 404-881-7000  
Fax: 404-881-7777  
jordan.edwards@alston.com  
blake.crohan@alston.com

*Counsel for Coca-Cola Consolidated,  
Inc., The Board of Directors of Coca-Cola  
Consolidated, Inc., and the Corporate  
Benefits Committee of Coca-Cola  
Consolidated, Inc.*

*Attorney for Defendants*

312 Old Lancaster Road  
Merion Station, PA 19066  
Telephone: (610) 890-0200  
Facsimile: (717) 233-4103  
Email: markg@capozziadler.com  
gabriellek@capozziadler.com

Donald R. Reavey  
Capozzi Adler, P.C.  
2933 North Front Street  
Harrisburg, PA 17110  
Telephone: (717) 233-4101  
Facsimile: (717) 233-4103  
Email: donr@capozziadler.com

*Counsel for Plaintiffs and the Plan*

### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing Joint Motion was filed this 19th day of January, 2022, with the clerk of court using the CM/ECF system, which will send electronic notification of such filing to all counsel of record in this matter.

/s/ Brian D. Boone

Brian D. Boone  
North Carolina Bar No. 38910  
ALSTON & BIRD LLP  
101 South Tryon Street, Suite 4000  
Charlotte, North Carolina 28280  
Phone: 704-444-1000  
Fax: 704-444-1111  
brian.boone@alston.com

*Counsel for Defendants Coca-Cola Consolidated, Inc.; The Board of Directors of Coca-Cola Consolidated, Inc.; and The Corporate Benefits Committee of Coca-Cola Consolidated, Inc.*